

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

JAMES M. BAKER, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00272-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
ROCHELLE PHILLIPS, On Behalf of Herself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00277-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	

[Caption continued on following page.]

MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND
FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL

JULY 5, 2005

ROBERT WILKINS, Individually and On)	Civil Action No. 1:05-cv-00287-GMS
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
LEONARD BRONSTEIN, On Behalf of)	Civil Action No. 1:05-cv-00289-GMS
Himself and All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
GREG PENN,)	Civil Action No. 1:05-cv-00293-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
CLIFFORD W. JONES, On Behalf of Himself)	Civil Action No. 1:05-cv-00316-GMS
and All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	

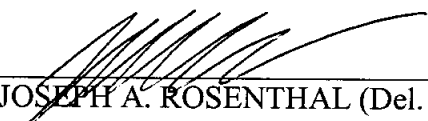
[Caption continued on following page.]

MICHAEL D. BLUM,)	Civil Action No. 1:05-cv-00372-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
_____)	

Class member City of Deerfield Beach Non-Uniform Employees Retirement Plan ("City of Deerfield Beach"), will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing City of Deerfield Beach as Lead Plaintiff; (iii) approving City of Deerfield Beach's selection of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and the law firm of Rosenthal, Monhait, Gross & Goddess, P.A. to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, City of Deerfield Beach submits herewith a Memorandum of Law and Declaration of Jeffrey S. Goddess dated July 5, 2005.

DATED: July 5, 2005

ROSENTHAL, MONHAIT, GROSS
& GODDESS, P.A



JOSEPH A. ROSENTHAL (Del. No. 234)
JEFFREY S. GODDESS (Del. No. 630)
JESSICA ZELDIN (Del. No. 3558)

919 Market Street, Suite 1401
Wilmington, DE 19801
Telephone: 302/656-4433
302/658-7567 (fax)

[Proposed] Liaison Counsel

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
PAUL J. GELLER
197 S. Federal Highway, Suite 200
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA, JR.
200 Broadhollow Road, Suite 406
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiffs

I:\MBNA\LP Motion\DE\LP Motion.doc